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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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August 29, 2001

**BY HAND**

Magalie Roman Salas, Esquire

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, S.W., Room TW-B204

Washington, DC 20554

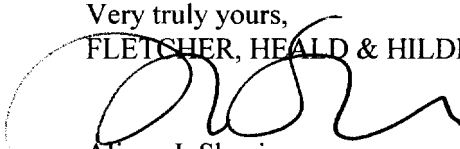
Re: Petition for Rulemaking  
Commonwealth Broadcasting, LLC  
Sinclair Telecable, Inc. d/b/a Sinclair Communications

Dear Ms. Salas:

Enclosed herewith, on behalf of Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc. d/b/a Sinclair Communications, are an original and four copies of their Petition for Rulemaking, requesting the Commission to amend the FM Table of Allotments to relocate channel 291B from Exmore, Virginia, to Belle Haven, Virginia, and to relocate Channel 241B from Cape Charles, Virginia, to Exmore, Virginia, as a replacement service.

Should there be any questions regarding this matter, kindly communicate directly with the undersigned.

Very truly yours,  
FLETCHER, HEALD & HILDRETH, P.L.C.

  
Alison J. Shapiro  
Counsel for  
Commonwealth Broadcasting, LLC  
Sinclair Telecable, Inc.  
d/b/a Sinclair Communications

Enclosure

cc: Mr. John A. Karousos, FCC (w/encl.)

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01-247

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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**AUG 29 2001**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

In the Matter of	)	
Amendment of Section 73.202(b)	)	
Table of Allotments,	)	MM Docket No. _____
FM Broadcast Stations.	)	RM No. _____
(Belle Haven, Virginia)	)	
(Cape Charles, Virginia)	)	
(Exmore, Virginia)	)	

To: Chief, Allocations Branch

**PETITION FOR RULEMAKING**

Commonwealth Broadcasting, LLC ("Commonwealth") and Sinclair Telecable, Inc. d/b/a Sinclair Communications ("Sinclair") (hereinafter referred to as "Petitioners"), by counsel, and pursuant to Section 1.401 of the Commission's rules, hereby respectfully request that the Commission institute a rulemaking proceeding for the purpose of amending the FM Table of Allotments to relocate Channel 291A from Exmore, Virginia to Belle Haven, Virginia, as that community's first local aural transmission service, and to relocate Channel 241B from Cape Charles, Virginia to Exmore, Virginia, as a replacement service. Thus, Petitioners propose to amend Section 73.202(b) of the Commission's rules as follows:

**Channel No.**

<b><u>City</u></b>	<b><u>Present</u></b>	<b><u>Proposed</u></b>
Exmore, Virginia	291A <sup>1</sup>	241B

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<sup>1</sup> Currently, there is a pending one-step application to upgrade WEXM to channel 291B at Exmore, Virginia (File No. BMPH-2010502AAR). Hereafter, channel 291 will be referred to as a Class B station. However, all of the technical statements made herein apply to both a Class

Belle Haven, Virginia	-----	291A
Cape Charles, Virginia	241B	None <sup>2</sup>

In support of this request, the following is stated:

The town of Belle Haven, Virginia, is an incorporated town which had a 2000 U.S. Census population of 521.<sup>3</sup> Belle Haven, located in Accomack County, is nestled between the Atlantic Ocean and the Chesapeake Bay and encompasses approximately 1.52 square miles of land (972 acres). The town of Belle Haven has a Mayor-Town Council form of government, volunteer fire department, post office, zip code, numerous businesses, bed and breakfasts, and a church.

The proposed rulemaking would relocate existing WEXM(FM), currently licensed to Commonwealth on channel 291B, from Exmore, Virginia, to Belle Haven, Virginia, and would relocate existing WROX-FM, currently licensed to Sinclair on channel 241B, from Cape Charles, Virginia, to Exmore, Virginia, as a replacement service. As demonstrated in the attached Engineering Statement, the reference coordinates for the proposed channels at Belle Haven and Exmore meet the minimum distance separation requirements with respect to all known licenses, construction permits, pending applications, and pending rulemaking proceedings. The Belle

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A and Class B facility. In addition, effective July 2, 2001, Channel 298B1, which was allotted to Exmore, Virginia, was reallocated to Fruitland, Maryland. See *In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Exmore and Cheriton, Virginia, and Fruitland, Maryland)*, MM Docket No. 99-347, DA 01-1242 (Released May 18, 2001).

<sup>2</sup> Noncommercial FM station WAZP, Channel 214B1, will remain licensed to Cape Charles, Virginia, and places a 70 dBu contour over the community.

<sup>3</sup> Source: [http://www.census.gov/population/estimates/metro-city/placebyco/SC99T8\\_VA.txt](http://www.census.gov/population/estimates/metro-city/placebyco/SC99T8_VA.txt).

Haven and Exmore allotment reference sites comply with the minimum spacing requirements contained in Section 73.207 of the Commission's rules.

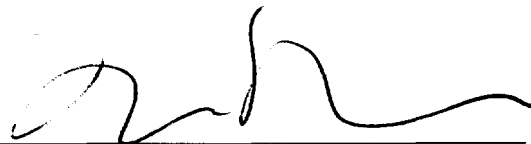
As stated above, the addition of Channel 291B will provide Belle Haven with its first local aural transmission service. Currently, there are no other commercial or noncommercial stations licensed to Belle Haven. Thus, the addition of this allotment at Belle Haven will promote the objectives of Section 307(b) of the Communications Act by seeking to achieve a fair, efficient and equitable distribution of broadcast stations among the various states and communities. 47 U.S.C. § 307(b). Furthermore, since WAZP(FM), a non-commercial FM station operating on channel 214B1, is already licensed to Cape Charles, Virginia, moving WROX-FM from Cape Charles to Exmore would still leave Cape Charles with transmission service.

The FM Table of Allotments was created to allow the Commission to meet its obligation under Section 307(b) and the allotment priorities developed in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 91 (1982). These were intended to promote the statutory goals underlying Section 307(b). The main objective of the 1982 revision was to provide service of satisfactory signal strength to the whole country, while providing as many program choices to as many listeners as possible and providing service of local origin to as many communities as possible. To these ends, the Commission set forth the following as priorities: (1) first full-time aural service; (2) second full-time aural service; (3) first local service and; (4) other public interest matters (priorities 2 and 3 were given co-equal weight). Thus, the allotment of a first full-time local aural transmission service to Belle Haven would satisfy the core objectives of Section 307(b), and also meets the Commission's third allotment priority.

In the event that this petition requesting the allotment of Channel 291B at Belle Haven, Virginia, and channel 241B at Exmore, Virginia, is granted, Petitioners will file modification applications to relocate station WEXM(FM) to Belle Haven, Virginia, and station WROX-FM to Exmore, Virginia, and if their respective modification applications are granted, will promptly file license applications to cover the modified facilities and begin broadcast transmissions.

WHEREFORE, in light of the foregoing, Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc. d/b/a Sinclair Communications respectfully request that the Commission GRANT this petition for rulemaking, AMEND the FM Table of Allotment, and relocate Channel 291B from Exmore, Virginia to Belle Haven, Virginia, as that community's first full-time local aural transmission service, and relocate Channel 241B from Cape Charles, Virginia, to Exmore, Virginia, as a replacement service.

Respectfully submitted,  
COMMONWEALTH BROADCASTING, LLC  
SINCLAIR TELECABLE, INC.  
D/B/A SINCLAIR COMMUNICATIONS

By: 

Howard M. Weiss  
Alison J. Shapiro

Its Counsel


Fletcher, Heald & Hildreth, P.L.C.  
1300 North 17<sup>th</sup> Street, 11<sup>th</sup> Floor  
Arlington, Virginia 22209  
(703)812-0400

August 29, 2001

**CERTIFICATE OF SERVICE**

I, Carla Whitlock, a secretary in the law firm of Fletcher, Heald & Hildreth, do hereby certify that a true copy of the foregoing *Petition for Rulemaking* was sent this 29th day of August 2001, via hand delivery and United States First Class Mail, postage prepaid, on the following:

Mr. John A. Karousos\*  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Room 2-A266  
Washington, D.C. 20554

  
Carla Whitlock

\*By Hand

**ORIGINAL FOR  
FILING WITH FCC**

*Prepared by:*

**Graham Brock, Inc.**

*Broadcast Technical Consultants*

*10 Sylvan Drive, #26 • St. Simons Island, GA 31522-2221*

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# GRAHAM BROCK, INC.

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BROADCAST TECHNICAL CONSULTANTS

**PETITION FOR RULE MAKING**  
**COMMONWEALTH BROADCASTING, LLC**  
**SINCLAIR TELECABLE, INC. dba**  
**SINCLAIR COMMUNICATIONS**  
**RE-ALLOT CHANNEL 291B**  
**BELLE HAVEN, VIRGINIA**  
**RE-ALLOT CHANNEL 241B**  
**EXMORE, VIRGINIA**  
**August 2001**

**TECHNICAL EXHIBIT**

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**PETITION FOR RULE MAKING**  
**COMMONWEALTH BROADCASTING, LLC**  
**SINCLAIR TELECABLE, INC. dba**  
**SINCLAIR COMMUNICATIONS**  
**RE-ALLOT CHANNEL 291B**  
**BELLE HAVEN, VIRGINIA**  
**RE-ALLOT CHANNEL 241B**  
**EXMORE, VIRGINIA**  
**August 2001**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits have been prepared on behalf of Commonwealth Broadcasting, LLC (“Commonwealth”), licensee of WEXM, Channel 291A, Exmore, Virginia, and Sinclair Telecable, Inc., dba Sinclair Communications (“Sinclair”), licensee of WROX-FM, Channel 241B, Cape Charles, Virginia<sup>1</sup>, hereinafter referred to as joint petitioners (“petitioners”). Petitioners herein request that Channel 291A<sup>2</sup> be re-allotted and upgraded to Channel 291B at Belle Haven, Virginia, as that community’s first locally licensable FM service. Further, in order to not remove the only local FM service to Exmore, Virginia. Petitioners also request that Channel 241B be re-allotted from Cape Charles to Exmore, Virginia.

**DISCUSSION**

2. The community of Belle Haven, Virginia, is located in southern Accomack County, Virginia, with a population of 521 persons.<sup>3</sup> Belle Haven has a Mayor with a Town Council as government. Belle Haven has a volunteer Fire Department, its own post office and numerous businesses.

- 
- 1) Principals of Commonwealth are also principals of Sinclair.
- 1) There is a pending one-step application to upgrade WEXM to Channel 291B at Exmore, Virginia (BMPH-20010502AAR). This instant Petition for Rule Making is to be considered a separate request.
- 2) Source: [www.census.gov/populations/estimates/metro-city/placebyco/SC99T8\\_va.txt](http://www.census.gov/populations/estimates/metro-city/placebyco/SC99T8_va.txt).

3. Channel 291B can be allotted to Belle Haven, Virginia, with a site restriction of 7.9 kilometers southwest of the community to avoid shortspacing WKHW, Channel 293A, Pocomoke City, Maryland, and allow the use of the present WEXM transmitter site. The reference site for the proposed allotment of Channel 291B at Belle Haven, Virginia, is North Latitude 37° 31' 46" and West Longitude 75° 54' 44". Attached as Exhibit #1 is a map depicting the area to locate Channel 291B at Belle Haven, Virginia. Further, attached as Exhibit #2 is a §73.207 spacing study demonstrating that Channel 291B meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities, with the exception of the present Channel 291 allotment at Exmore, Virginia. From the proposed reference site, a theoretical 3.16 mV/m (70 dBu) signal will be provided over Belle Haven.

4. Since the proposed re-allotment of Channel 291B from Exmore to Belle Haven, Virginia, would remove the only locally licensed FM channel from the community, Petitioners propose the re-allotment of Channel 241B from Cape Charles to Exmore, Virginia. Channel 241B can be allotted to Exmore, Virginia, but the present WROX-FM site cannot be used as a reference site for the re-allotment, due to the distance from the community of Exmore. The present WROX-FM site is located 34.0 kilometers from the center of Exmore and, as such, the 3.16 mV/m contour of a maximum Class B facility would not encompass the community. Therefore, the proposed allocation site is closer to Exmore.

5. It is further noted that the presently authorized site for Channel 241B at Cape Charles, Virginia, does not meet the minimum distance separation requirements to WVKL, Channel 239B, Norfolk, Virginia. Both Channel 241B at Cape Charles, Virginia, and Channel 239B at

Norfolk were allotted prior to March 1, 1984. As can be seen on Exhibit #3, from the presently authorized WROX-FM site, Channel 241B is shortspaced to WVKL by 10.01 kilometers, based on §73.207 of the Commission's rules. This shortage was created as a result in the change of the minimum distance separation requirements for Class B second and third adjacent channels adopted as part of MM Docket #80-90. Prior to the implementation of these rules, second adjacent Class B stations were separated by 64.0 kilometers (40.0 miles). As authorized, WROX-FM is located 63.99 kilometers from WVKL, in compliance with the previously authorized distance. As such, Channel 241B at Cape Charles has a grandfathered shortspace to Channel 239B at Norfolk, Virginia.

6. The proposed reference site for Channel 241B at Exmore, is 4.86 kilometers from the present WROX-FM site, even further removed from WVKL, at geographic coordinates North Latitude 37° 18' 02" and West Longitude 75° 59' 05".<sup>4</sup> This represents a site restriction of 30.5 kilometers from the community of Exmore, to avoid shortspacing WOSC, Channel 240B1, Bethany Beach, Maryland, and a new construction permit for Channel 243A at Chincoteague, Virginia. From the proposed reference site, as detailed on Exhibit #4, the allocation site for Channel 241B at Exmore is located 68.81 kilometers from WVKL. Thus, the shortspacing to WVKL is reduced. Exhibit #5 is a map demonstrating where Channel 241B can be located to provide service to Exmore, Virginia.<sup>5</sup> From the proposed reference site, a 3.16 mV/m contour will be delivered to Exmore, Virginia.<sup>6</sup>

- 
- 3) The spacing between the proposed reference site and WVKL is greater than the grandfathered 64.0 kilometer distance.
  - 4) Based on maintaining a distance of 64.0 kilometers to WVKL and complying with §73.207 rules to all other FM facilities.
  - 5) Based on uniform terrain. It is the intention of Sinclair to specify the existing WROX-FM site to provide service to Exmore following the conclusion of this proceeding. The present WROX-FM facilities provide the requisite 70 dBu signal to Exmore, Virginia, utilizing a supplemental city grade analysis (point-to-point or Longley-Rice), that will be demonstrated in an application. As such, no actual change in the WROX-FM coverage or channel spacing will occur.

7. Therefore, Petitioners herein request the following changes in §73.202 of the Commission's rules.

**Belle Haven, Virginia**

Present	Proposed
None	291B

**Exmore, Virginia**

Present	Proposed
291A <sup>7</sup>	241B

**Cape Charles, Virginia**

Present	Proposed <sup>8</sup>
241B	None

**PUBLIC INTEREST**

8. The allotment of Channel 291B to Belle Haven, Virginia, will provide that community with its first locally licensable FM channel, without depriving Exmore of its only local service (based on the re-allotment of Channel 241B from Cape Charles to Exmore). A re-allotted Channel 291B at Belle Haven, Virginia, will provide 60 dBu (1.0 mV/m) service to 72,545 persons in 8,560.0 square kilometers. This reflects an increase of 60,038 persons in 7,488.3 square kilometers over the present licensed WEXM facilities at Exmore.<sup>9</sup>

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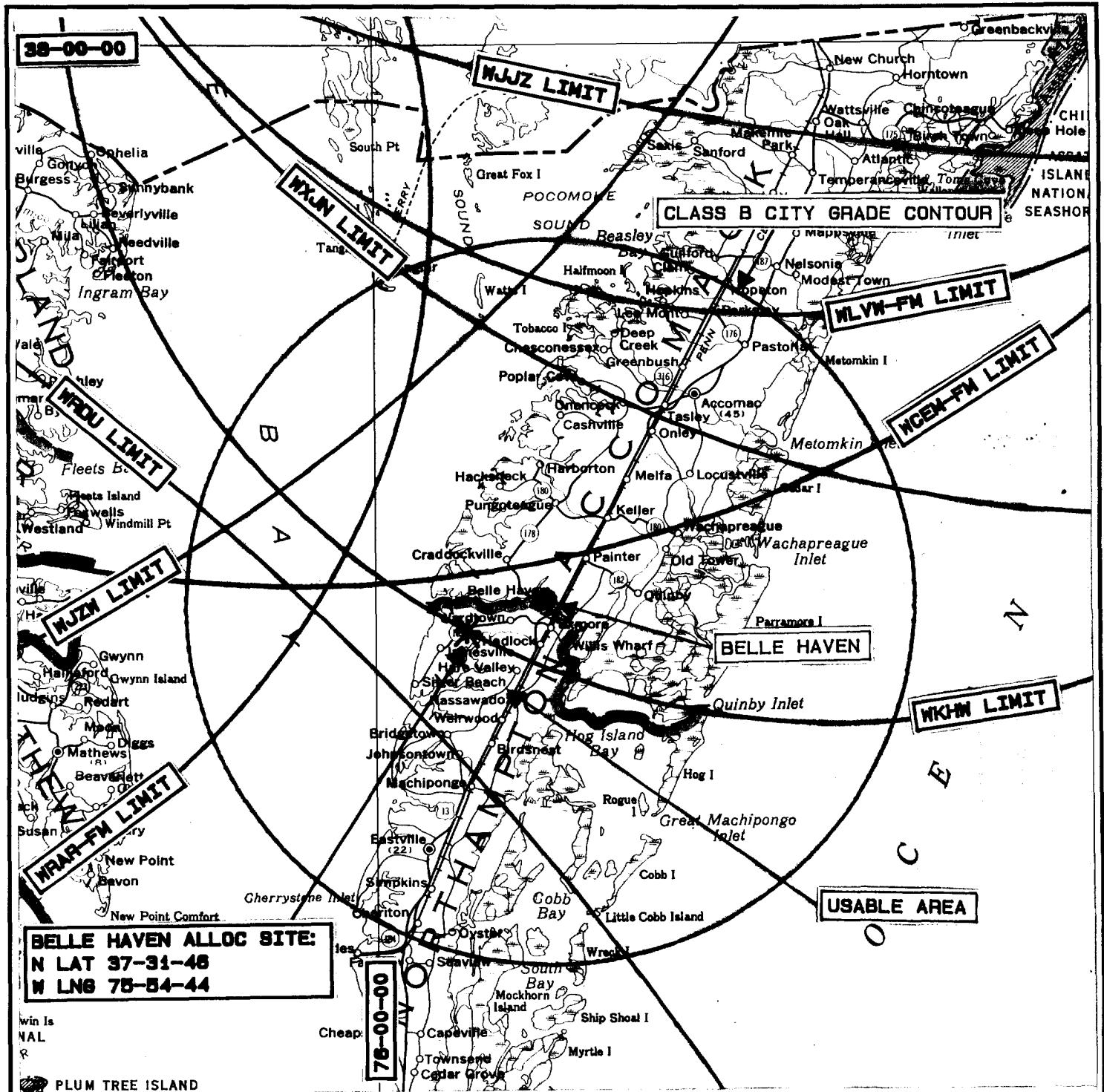
7) See Footnote 1 supra.

7) Non-commercial FM station WAZP, Channel 214B1 will remain licensed to Cape Charles, Virginia, and places a 70 dBu contour over the community .

8) The present WEXM licensed facility provides service to 12,507 persons in 1,072.0 square kilometers.

9. Once Channel 291B is allotted to Belle Haven, Virginia, and Channel 241B is allotted to Exmore, Virginia, Petitioners will submit the required minor change applications for construction permit (FCC Form 301) seeking authority to make the changes to the facilities of WEXM and WROX-FM, respectively.

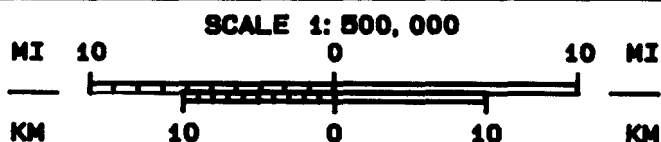
10. The foregoing technical statement was prepared on behalf of Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc., dba Sinclair Communications by Graham Brock, Inc., Technical Consultants. All data related to FM facilities was extracted from the CDBS database, all population data from the PL 94-171 files (2000 Census). We assume no liability for errors or omissions in those databases, which may be adverse to the requests contained herein.



# **USABLE AREA MAP - CH 291B**

MAP IS A PORTION OF THE 1: 500, 000 SCALE  
 U.S.G.S. BASE STATE MAP OF VIRGINIA

**EXHIBIT #1**  
**PETITION FOR RULE MAKING**  
**COMMONWEALTH / SINCLAIR**  
**RE-ALLOT**  
**CH 291B TO BELLE HAVEN, VA**  
**CH 241B TO EXMORE, VA**  
**August 2001**



**GRAHAM BROCK, INC.**  
 BROADCAST TECHNICAL CONSULTANTS

August 2001

ALLOCATION STUDY FOR BELLE HAVEN, VIRGINIA  
USING PROPOSED ALLOCATION SITE AS REFERENCE

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WEXM.A	291B	Exmore	VA	0.0	0.00	241.0	-241.00
APP CX	37 31 46	75 54 44	30.000 kW	81M	0.0	149.8	
	Commonwealth Broadcasting, LLC			BMFH-20010502AAR			
ALLO	291B	Exmore	VA	0.0	0.00	241.0	-241.00
VAC	37 31 46	75 54 44	0.000 kW	0M	0.0	149.8	
WEXM	291A	Exmore	VA	0.0	0.00	178.0	-178.00
LIC C	37 31 46	75 54 44	1.500 kW	81M	0.0	110.6	
	Commonwealth Broadcasting, LLC			BLH-20010420AAT			
WKHW	293A	Pocomoke City	MD	28.2	69.10	69.0	0.10
LIC CN	38 04 37	75 32 19	1.800 kW	104M	43.0	42.9	
	Great Scott Broadcasting			BLH-19920512KD			
WCEMFM	292A	Cambridge	MD	352.8	117.99	113.0	4.99
LICDCN	38 35 02	76 04 56	6.000 kW	99M	73.3	70.2	
	Mts Broadcasting L.C.			BLH-19960617KC			
WCEMFM	292A	Cambridge	MD	352.8	118.01	113.0	5.01
CP DCX	38 35 03	76 04 54	6.000 kW	99M	73.3	70.2	
	Mts Broadcasting L.C.			BPH-20010606AAB			
WRDU	291C	Wilson	NC	226.5	282.57	274.0	8.57
LIC CN	35 45 36	78 11 04	100.000 kW	411M	175.6	170.3	
	Capstar TX Limited Partnership			BLH-19840912CR			
WRARFM	288A	Tappahannock	VA	298.4	81.40	69.0	12.40
LIC CN	37 52 27	76 43 37	6.000 kW	100M	50.6	42.9	
	Rappahannock Communications			BLH-19910812KA			
WJZW	290B	Woodbridge	VA	325.2	185.13	169.0	16.13
AUXDCN	38 53 30	77 07 55	40.000 kW	138M	115.1	105.0	
	WMAL, Inc.			BPH-19961114IB			
WJZW	290B	Woodbridge	VA	323.0	188.35	169.0	19.35
LICDEN	38 52 28	77 13 24	28.000 kW	198M	117.1	105.0	
	WMAL, Inc.			BLH-19851021KC			
WXJN	290A	Lewes	DE	26.0	137.88	113.0	24.88
LIC CN	38 38 36	75 13 00	6.000 kW	100M	85.7	70.2	
	Delmarva Broadcasting Company			BLH-19920610KB			

**PETITION FOR RULE MAKING**  
**COMMONWEALTH BROADCASTING, LLC**  
**SINCLAIR TELECABLE, INC. dba**  
**SINCLAIR COMMUNICATIONS**  
**RE-ALLOT CHANNEL 291B**  
**BELLE HAVEN, VIRGINIA**  
**RE-ALLOT CHANNEL 241B**  
**EXMORE, VIRGINIA**

**August 2001**

**EXHIBIT #3**

PRESENT CLEARANCE STUDY FOR WROX-FM CAPE CHARLES, VIRGINIA  
USING PRESENT WROX-FM SITE AS REFERENCE

REFERENCE		DISPLAY DATES
37 15 47 N	CLASS B	DATA 08-03-01
76 00 47 W	Current rules spacings	SEARCH 08-07-01
----- CHANNEL 241 - 96.1 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
-----							
WROXFM 241B	Cape Charles	VA	0.0	0.00	241.0	-241.00	
LIC C	37 15 47	76 00 47	23.000 kW	220M	0.0	149.8	
	Sinclair Telecable, Inc.		BLH-19950713KD				
WVKL	239B	Norfolk	VA	219.1	63.99	74.0	-10.01
LIC CN	36 48 56	76 28 00	40.000 kW	268M	39.8	46.0	
	Entercom Norfolk License, LLC		BMLH-19920706KA				
WOSC.A	240B1	Bethany Beach	DE	30.5	149.87	145.0	4.87
APP CX	38 25 20	75 08 23	10.300 kW	143M	93.1	90.1	
	Capstar TX Limited Partnership		BPH-20010306ABC				
WOSC	240B1	Bethany Beach	DE	29.9	162.71	145.0	17.71
LIC CN	38 31 45	75 04 50	19.000 kW	115M	101.1	90.1	
	Capstar TX Limited Partnership		BLH-19940922KD				
970911	243A	Chincoteague	VA	36.9	91.66	69.0	22.66
CP CN	37 55 14	75 23 06	2.800 kW	145M	57.0	42.9	
	Sebago Broadcasting		BPH-19970911NE				
WGRQ	240A	Colonial Beach	VA	318.2	144.94	113.0	31.94
LIC CN	38 13 45	77 07 10	2.400 kW	160M	90.1	70.2	
	Telemedia Broadcasting, Inc.		BMLH-19980811KA				
WKJX	244A	Elizabeth City	NC	192.1	108.47	69.0	39.47
LIC CN	36 18 26	76 16 03	3.000 kW	86M	67.4	42.9	
	East Carolina Radio, Inc.		BLH-19840829CS				
WHURFM	242B	Washington	DC	333.9	209.34	169.0	40.34
LIC CN	38 57 01	77 04 47	24.000 kW	204M	130.1	105.0	
	The Howard University		BLH-5867				
WAFX	295C	Suffolk	VA	232.5	83.34	35.0	48.34
LIC CN	36 48 16	76 45 17	100.000 kW	300M	51.8	21.8	
	Tidewater Communications, Inc.		BLH-19890929KC				
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**PETITION FOR RULE MAKING**  
**COMMONWEALTH BROADCASTING, LLC**  
**SINCLAIR TELECABLE, INC. dba**  
**SINCLAIR COMMUNICATIONS**  
**RE-ALLOT CHANNEL 291B**  
**BELLE HAVEN, VIRGINIA**  
**RE-ALLOT CHANNEL 241B**  
**EXMORE, VIRGINIA**

**August 2001**

**EXHIBIT #4**

ALLOCATION STUDY FOR CHANNEL 241B EXMORE, VIRGINIA  
 USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE			CLASS B	DISPLAY DATES			
37 18 02 N				DATA	08-03-01		
75 59 05 W			Current rules spacings	SEARCH	08-07-01		
----- CHANNEL 241 - 96.1 MHz -----							
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WROXFM 241B	Cape Charles	VA	211.0	4.86	241.0	-236.14	
LIC C	37 15 47	76 00 47	23.000 kW	220M	3.0	149.8	
	Sinclair Telecable, Inc.		BLH-19950713KD				
WVKL 239B	Norfolk	VA	218.6	68.81	74.0	-5.19	
LIC CN	36 48 56	76 28 00	40.000 kW	268M	42.8	46.0	
	Entercom Norfolk License, LLC		BMLH-19920706KA				
WOSC.A 240B1	Bethany Beach	DE	30.5	145.01	145.0	0.01	
APP CX	38 25 20	75 08 23	10.300 kW	143M	90.1	90.1	
	Capstar TX Limited Partnership		BPH-20010306ABC				
WOSC 240B1	Bethany Beach	DE	29.9	157.85	145.0	12.85	
LIC CN	38 31 45	75 04 50	19.000 kW	115M	98.1	90.1	
	Capstar TX Limited Partnership		BLH-19940922KD				
970911 243A	Chincoteague	VA	37.3	86.83	69.0	17.83	
CP CN	37 55 14	75 23 06	2.800 kW	145M	54.0	42.9	
	Sebago Broadcasting		BPH-19970911NE				
WGRQ 240A	Colonial Beach	VA	316.3	143.60	113.0	30.60	
LIC CN	38 13 45	77 07 10	2.400 kW	160M	89.3	70.2	
	Telemedia Broadcasting, Inc.		BMLH-19980811KA				
WHURFM 242B	Washington	DC	332.8	206.76	169.0	37.76	
LIC CN	38 57 01	77 04 47	24.000 kW	204M	128.5	105.0	
	The Howard University		BLH-5867				
WKJX 244A	Elizabeth City	NC	192.9	113.08	69.0	44.08	
LIC CN	36 18 26	76 16 03	3.000 kW	86M	70.3	42.9	
	East Carolina Radio, Inc.		BLH-19840829CS				



**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

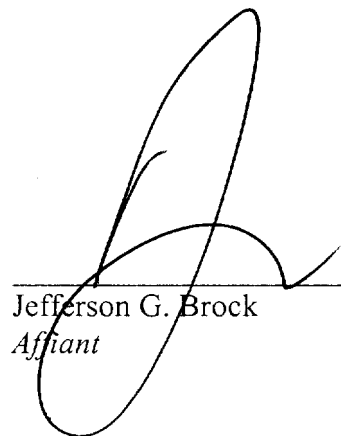
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Commonwealth Broadcasting, LLC, and Sinclair Telecable, Inc., dba Sinclair Communications, licensees of Radio Station WEXM and WROX, respectively, to prepare the attached Technical Exhibit.

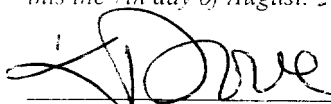
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 7th day of August, 2001.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 7th day of August, 2001.*

  
\_\_\_\_\_  
Notary Public, State of Georgia

*My Commission Expires: April 20, 2002*